

EXHIBIT A

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF TEXAS

3 THE HONORABLE KENNETH M. HOYT, JUDGE PRESIDING

4 KONNECH, INC.,) Cause No. 4:22-cv-03096
5 Plaintiff,)
6 vs.)
7 TRUE THE VOTE, et al.,)
8 Defendants.)

9 -----
10 **HEARING**

11 OFFICIAL COURT REPORTER'S TRANSCRIPT

12 Houston, Texas

13 **October 27, 2022**

14 -----
15 APPEARANCES:

On behalf of the Plaintiff:
16 Constantine Z. Pamphilis, Esq.
Nathan Richardson, Esq.

17 On behalf of the Defendants:

Brock Cordt Akers, Esq. (Not present)
Michael John Wynne, Esq.
John C. Kiyonaga, Esq.

20
21 Reported By: Nichole Forrest, CSR, RDR, CRR, CRC
Certified Realtime Reporter
22 United States District Court
23 Southern District of Texas

24 Proceedings recorded by mechanical stenography.
Transcript produced by Reporter on computer.

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1 around and trying to find things. But we also do
2 geospatial research.

3 THE COURT: Were you planning to put the
4 names of the individuals who worked for the Harris
5 County polling, Bexar County polling, all of that data
6 that you said that you saw, were you planning to post
7 that data on a public venue?

8 THE WITNESS: No, sir.

9 THE COURT: Does this sound familiar to
10 you: Gregg and Catherine, GC -- that's you, Gregg and
11 Catherine -- stumbled onto voting software used to
12 corroborate elections. Was left with default
13 password.

14 What is a default password?

15 THE WITNESS: A password that the software
16 would be shipped with.

17 THE COURT: Is what?

18 THE WITNESS: When they ship it to be
19 installed.

20 THE COURT: That means that someone has
21 intercepted a password?

22 THE WITNESS: No, sir. It ships with the
23 password. I think that is what it's referring to.

24 THE COURT: No. I'm asking you what
25 you're referring to.

1 It says here: You were left with -- you
2 used to coordinate the elections, was left with
3 default password of database.

4 What are you talking about?

5 THE WITNESS: Like I said, a password that
6 would be shipped with the software.

7 THE COURT: And so the software you're
8 referring to is what?

9 THE WITNESS: I don't recall. I mean,
10 do --

11 THE COURT: We're talking about this
12 software. We're talking about this data.

13 THE WITNESS: Well, I don't know that we
14 are or aren't. We could be talking about the
15 Open.INK.

16 THE COURT: But you're the one talking
17 about it.

18 THE WITNESS: Right. But I don't know if
19 that's what I was referring to.

20 THE COURT: Well, you said you stumbled
21 onto voting software used to coordinate elections.

22 That is what Konnech does, isn't it?

23 THE WITNESS: I think it's one of the
24 things they do.

25 THE COURT: Well, do they do it or not?